Case: 4:21-cr-00566-RLW Doc. #: 4 Filed: 10/13/21 Page: 1 of 2 PageID #: 8

## UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MISSOURI EASTERN DIVISION

OCT 1 3 2021
U. S. DISTRICT COURT

UNITED STATES OF AMERICA,	)
Plaintiff,	)
v.	3 4:21CR566 RLW/NAB
JAHEIM YOUNG,	
Defendant.	) )

## MOTION FOR PRETRIAL DETENTION AND HEARING

Comes now the United States of America, by and through its Attorneys, Sayler A. Fleming, United States Attorney for the Eastern District of Missouri, and Jennifer Szczucinski, Assistant United States Attorneys for said District, and moves the Court to order the Defendant detained pending trial, and further requests that a detention hearing be held three (3) days from the date of the Defendant's initial appearance before the United States Magistrate pursuant to Title 18, United States Code, § 3141, et seq.

As and for its grounds, the United States of America states as follows:

- 1. The Defendant is charged with being a felon in possession of a firearm, in violation of 18 U.S.C. § 922(g) an offense for which a maximum 10 years imprisonment is prescribed under Title 18.
- 2. Pursuant to Title 18, United States Code, Section 3142(g), the weight of the evidence against defendant, the defendant's history and characteristics, and the nature and seriousness of the danger to any person or the community that would be posed by defendant's release warrant defendant's detention pending trial.
  - 3. There is a serious risk that the defendant will flee.

WHEREFORE, the United States requests this Court to order the Defendant detained prior to trial, and further to order a detention hearing three (3) days from the date of the Defendant's initial appearance.

Respectfully submitted,

SAYLER A. FLEMING United States Attorney

/s/ Jennifer Szczucinski
JENNIFER SZCZUCINSKI, #56906MO
Assistant United States Attorney